

4. This matter is subject to removal pursuant to 28 U.S.C. § 1441.

5. Wilson seeks to remove this action from the 44th Judicial District Court of Dallas County, Texas, to the United States District Court for the Northern District of Texas, Dallas Division, on the following grounds.

BASIS FOR REMOVAL

6. Removal is proper because the counterclaims present federal questions. *See* 28 U.S.C. § 1446(b)(3).

7. All documents in the state court action are attached to this notice at Exhibit A as required by 28 U.S.C. § 1446.

8. Venue is proper in this district under 28 U.S.C. § 1441(a) because this district and division embrace the place where the removed action has been pending and where Plaintiff alleges the events subject to the lawsuit arose.

9. Wilson will promptly file a copy of this Notice of Removal with the clerk of the court where the action has been pending.

CONCLUSION AND PRAYER

10. Wilson asks that this action be removed to this Court and this Court accept jurisdiction of this action, and that the action be placed on the docket of this Court for further proceedings, as though it had originally been instituted in this Court.

11. By filing this Notice of Removal, Wilson does not intend to waive her right to assert any claims, defenses or other motions permitted under the Federal Rules of Civil Procedure.

12. For the reasons stated above, Wilson respectfully requests that this Court take jurisdiction of this action to its conclusion and final judgment to the exclusion of any further proceedings in the state court action.

Dated: March 5, 2020

Respectfully submitted,

/s/ Jessica Brown Wilson
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of this document has been served via e-mail on Plaintiff's counsel of record, shown below, on this 5th day of March, 2020.

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/s/ Jessica Brown Wilson
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